

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINNAVATIONS LLC,

§§§§§§§§§§

Plaintiff,

Case No:

VS.

PATENT CASE

BILL.COM, INC.

§§§§§

Defendant.

COMPLAINT

Plaintiff Finnavations LLC (“Plaintiff” or “Finnavations”) files this Complaint against Bill.com, Inc. (“Defendant” or “Bill.com”) for infringement of United States Patent No. 9,569,755 (hereinafter “the ‘755 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with an office located at 3415 Custer Rd., Suite 120-B, Plano, Texas 75023.

4. Upon information and belief, Defendant is a Delaware corporation with its principal place of business at 1810 Embarcadero Road, Palo Alto, CA 94303.

5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted

business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to reside in this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 9,569,755)

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '755 Patent with sole rights to enforce the '755 Patent and sue infringers.

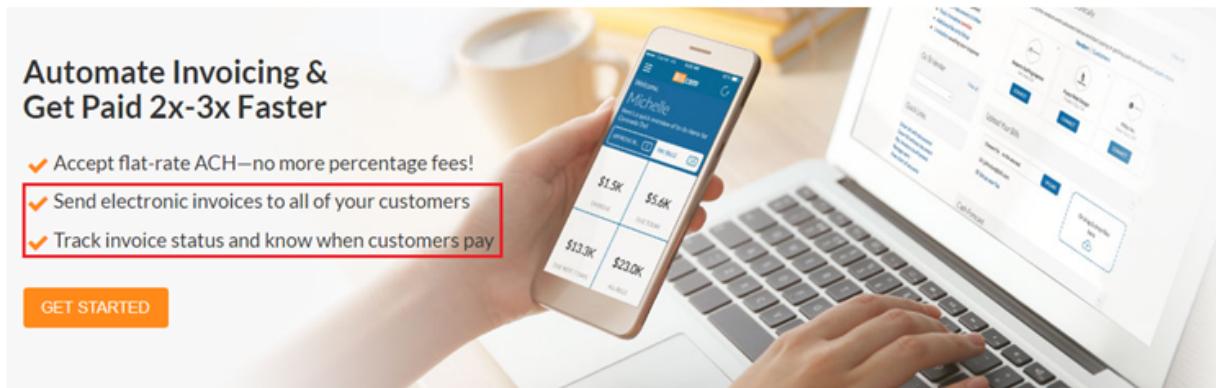
11. A copy of the '755 Patent, titled "Financial Management System," is attached hereto as Exhibit A.

12. The '755 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code. The '755 Patent was issued on February 14, 2017 after all claims of the '755 Patent overcame Examiner's claim rejections under 35 USC § 101 raised in the Examiner's June 14, 2016 non-final rejection.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claims 9 and 17 of the '755 Patent by making, using, importing, selling, and/or offering for sale a financial management system, including the

Bill.com billing services platform, the Bill.com mobile and/or web applications, and any similar products and/or services (“Product”), covered by at least Claims 9 and 17 of the ‘755 Patent. Defendant has infringed and continues to infringe the ‘755 Patent in violation of 35 U.S.C. § 271.

14. Regarding Claim 9, Defendant sells, offers to sell, and/or uses the Product, which provides for delivery of transaction data (e.g., data regarding paid invoices is transferred to the Bill.com platform) to a financial management program (e.g., the Bill.com platform residing on a cloud server). Certain aspects of this element and other elements referred to below are illustrated in the following screenshots.



<https://www.bill.com/product/accounts-receivable/>

Getting paid is easier than ever.



SELECT PAYMENT TYPE

Choose ACH processing, credit card, or PayPal payments.

SEND AUTOMATED INVOICES

Customers review and pay from any device.

GET PAID FASTER

Send personalized, automated reminders.

UPDATE YOUR BOOKS

Syncs with QuickBooks, Xero, and Intacct.

<https://www.bill.com/product/accounts-receivable/>

The screenshot shows the Bill.com interface for managing accounts receivable. At the top, there's a navigation bar with links for HOME, INBOX, PAYABLES, RECEIVABLES, DOCUMENTS, REPORTS, and NETWORK. Below that is a secondary navigation bar with links for OVERVIEW, GET PAID, CUSTOMERS, ITEMS, INVOICES, RECURRING INVOICES, and PAYMENTS. The main content area is titled 'Overview' and contains two sections: 'Open Invoices' and 'Payments Received'. Both sections have red boxes around them. The 'Open Invoices' section displays a table with columns for Type, #, Total, and Due Date. The 'Payments Received' section displays a table with columns for Type, Total, and Date. A video player at the bottom indicates a duration of 00:04.

<https://www.bill.com/product/accounts-receivable/>

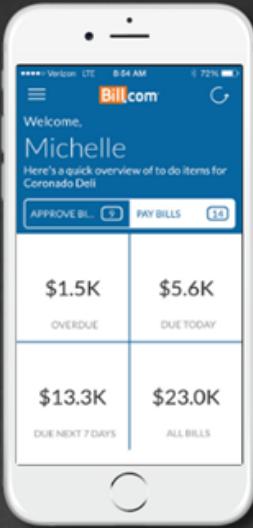
The screenshot shows a 'Record Manual Payment' form. It includes fields for AMOUNT (\$375.00), PAYMENT DATE (04/26/16), PAYMENT TYPE (Check), REFERENCE NUMBER (2346), and DEPOSIT TO (Accounts Receivable). Below the form is a table titled 'Apply Payment and Credits To:' with a red box around it. The table has columns for INVOICE #, INVOICE DATE, DUE DATE, AMOUNT, AMOUNT DUE, AMOUNT PAID, and SELECT. A row for INVOICE # 041 is selected, indicated by a checked checkbox in the SELECT column. A video player at the bottom indicates a duration of 00:22.

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

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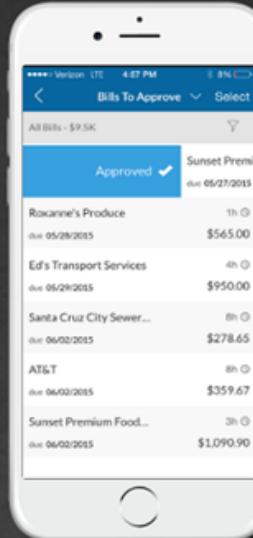
Stay on top of your business payments on the go.

https://www.bill.com/overview_v1/

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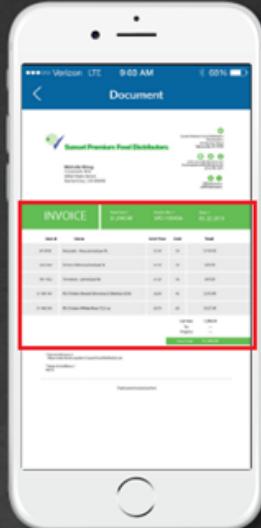
Approve, pay, or deny bills with a swipe.

https://www.bill.com/overview_v1/

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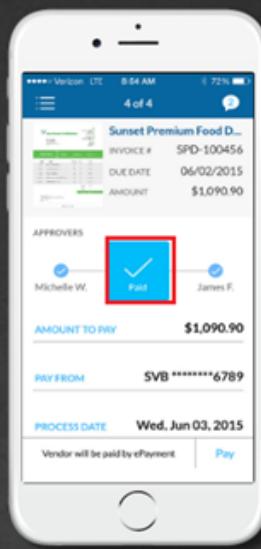
Check the original invoices.

https://www.bill.com/overview_v1/

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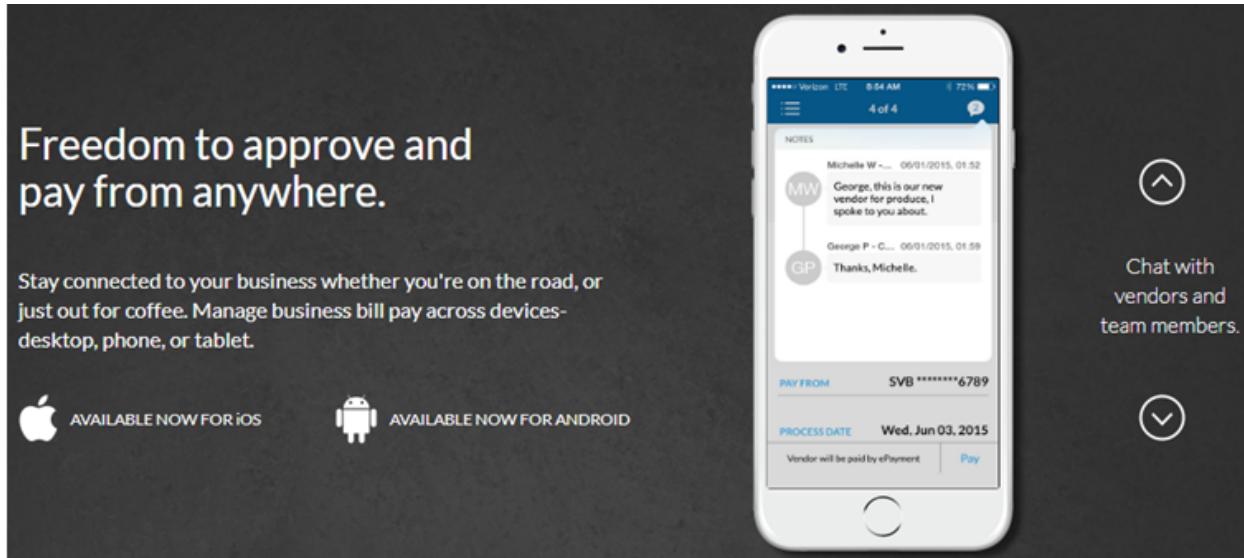
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See who else has approved, or needs to.

https://www.bill.com/overview_v1/



https://www.bill.com/overview_v1/

15. The Product uses a network device (e.g., a laptop, computer, or smartphone) to conduct an online financial transaction (e.g., a user can use the Bill.com mobile application or web application to send invoices to customers and receive payment) with a commercial web server (e.g., the processing server utilized to process a customer invoice payment). Certain aspects of these elements are illustrated in the following screenshots and/or in screen shots provided in connection with other allegations herein.

Automate Invoicing & Get Paid 2x-3x Faster

- ✓ Accept flat-rate ACH—no more percentage fees!
- ✓ Send electronic invoices to all of your customers
- ✓ Track invoice status and know when customers pay

GET STARTED

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<https://www.bill.com/product/accounts-receivable/>

<https://www.bill.com/product/accounts-receivable/>

Record Manual Payment

* AMOUNT	\$375.00
* PAYMENT DATE	04/26/16 <input type="button" value="..."/>
PAYMENT TYPE	Check <input type="button" value="▼"/>
REFERENCE NUMBER	2346
DEPOSIT TO	Accounts Receivable <input type="button" value="▼"/>
MEMO	<input type="text"/>

Apply Payment and Credits To:

INVOICE #	INVOICE DATE	DUUE DATE	AMOUNT	AMOUNT DUE	AMOUNT PAID	SELECT
041	04/26/16	05/26/16	\$375.00	\$375.00	\$375.00	<input checked="" type="checkbox"/>

Unapplied amount: \$0.00

00:22

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

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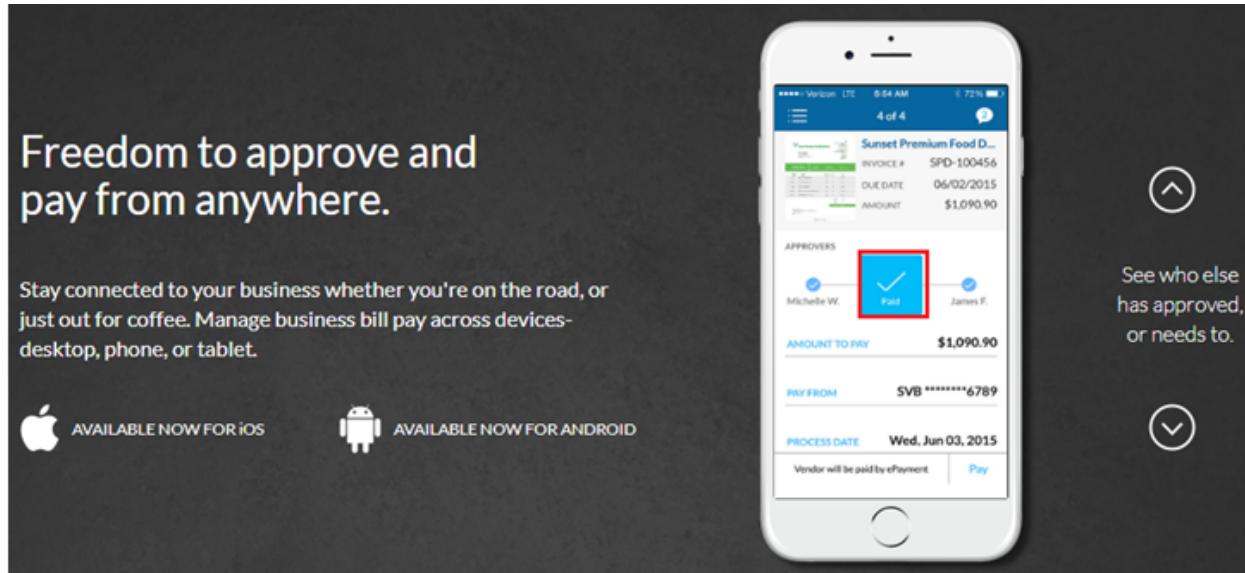
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Check the original invoices.

https://www.bill.com/overview_v1/



https://www.bill.com/overview_v1/

16. The Product utilizes a financial assistant (e.g. the Bill.com mobile application or web application) on a network device (e.g., a laptop, computer, or smartphone) to search a set of transmitted data related to online financial transactions (e.g., the Bill.com application must analyze the data transmitted during an invoice payment in order to determine and display the current status of said invoice on a user dashboard). Certain aspects of these elements are illustrated in the following screenshots and/or in screenshots provided in connection with other allegations herein.

The screenshot shows the Bill.com application interface. At the top, there is a navigation bar with links for HOME, INBOX, PAYABLES, RECEIVABLES, DOCUMENTS, REPORTS, and NETWORK. Below this is a secondary navigation bar with links for OVERVIEW, GET PAID, CUSTOMERS, ITEMS, INVOICES, RECURRING INVOICES, and PAYMENTS. The main content area is titled "Overview". It features two prominent buttons: "Open Invoices" and "Payments Received", both of which are highlighted with red boxes. Below these buttons are two tables. The first table, "Open Invoices", lists categories: Overdue, Due in Next 7 Days, Due in 7+ Days, and a total row. The second table, "Payments Received in Bill.com", lists categories: Today, Last 7 Days, This Month (Apr), and Last Month (Mar). A video player interface is visible at the bottom of the screen.

<https://www.bill.com/product/accounts-receivable/>

The screenshot shows the "Record Manual Payment" form in the Bill.com application. It includes fields for AMOUNT (\$375.00), PAYMENT DATE (04/26/16), PAYMENT TYPE (Check), REFERENCE NUMBER (2346), and DEPOSIT TO (Accounts Receivable). Below the form is a section titled "Apply Payment and Credits To:" with a table. The table has columns for INVOICE #, INVOICE DATE, DUE DATE, AMOUNT, AMOUNT DUE, AMOUNT PAID, and SELECT. A single row is selected, highlighted with a red box, showing INVOICE # 041, INVOICE DATE 04/26/16, DUE DATE 05/26/16, AMOUNT \$375.00, AMOUNT DUE \$375.00, and AMOUNT PAID \$375.00. A checkmark is present in the SELECT column. A message at the bottom right states "Unapplied amount: \$0.00". A video player interface is visible at the bottom of the screen.

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

17. The financial assistant on the network device determines whether the searched data comprises transaction data for the online financial transaction (e.g., the Bill.com application must determine if a particular invoice payment data is related to a particular invoice so that it can correlate a particular payment to particular invoice and display the status of said invoice accurately). Certain aspects of these elements are illustrated in the following screenshots and/or in screenshots provided in connection with other allegations herein.

<https://www.bill.com/product/accounts-receivable/>

INVOICE #	INVOICE DATE	DUUE DATE	AMOUNT	AMOUNT DUE	AMOUNT PAID	SELECT
041	04/26/16	05/26/16	\$375.00	\$375.00	\$375.00	<input checked="" type="checkbox"/>

Unapplied amount: \$0.00

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

18. When searched data (e.g., transaction data related to invoice payments) comprises transaction data in a first data structure (e.g., the data structure utilized to consummate a credit card payment on a processing server) compatible with conducting the online financial transaction (e.g., the online payment of an invoice), the financial assistant (e.g., the Bill.com application operating on a computer, laptop, or smartphone) copies the transaction data (e.g., basic information included in the credit card payment of an invoice such as the payment amount) and additional transaction data not included in the transmitted

transaction data (e.g., the Bill.com application will combine basic information such as the payment amount with other information relating to the invoice such as the client name, and status of the invoice) into a second data structure compatible with the financial management program (e.g., the data structure utilized by the Bill.com platform to store complied invoice data on a server and display said compiled invoice data on a mobile or web application).

19. Regarding Claim 17, Defendant utilizes a network device that is at least one of a terminal device (e.g., smartphone, laptop or computer) and a computer server (e.g., server hosting the Payoneer platform). Certain aspects of these elements are shown above in connection the paragraphs discussing Claim 9 and the screen shots provided below and elsewhere herein.

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Bill.com

Search

HOME INBOX PAYABLES RECEIVABLES DOCUMENTS REPORTS NETWORK

OVERVIEW GET PAID CUSTOMERS ITEMS INVOICES RECURRING INVOICES PAYMENTS

Overview

Open Invoices Payments Received

Open Invoices	#	Total	Payments Received in Bill.com	Total
Overdue	18	\$38,572.50	Today	\$0.00
Due in Next 7 Days	0	\$0.00	Last 7 Days	\$0.00
Due in 7+ Days	1	\$135.00	This Month (Apr)	\$100.00
Due in 30+ Days	19	\$38,707.50	Last Month (Mar)	\$0.00

00:04

vimeo

<https://www.bill.com/product/accounts-receivable/>

Record Manual Payment

* AMOUNT	\$375.00
* PAYMENT DATE	04/26/16 <input type="button" value="..."/>
PAYMENT TYPE	Check <input type="button" value="▼"/>
REFERENCE NUMBER	2346
DEPOSIT TO	Accounts Receivable <input type="button" value="▼"/>
MEMO	<input type="text"/>

Apply Payment and Credits To:

INVOICE #	INVOICE DATE	DUUE DATE	AMOUNT	AMOUNT DUE	AMOUNT PAID	SELECT
041	04/26/16	05/26/16	\$375.00	\$375.00	\$375.00	<input checked="" type="checkbox"/>

Unapplied amount: \$0.00

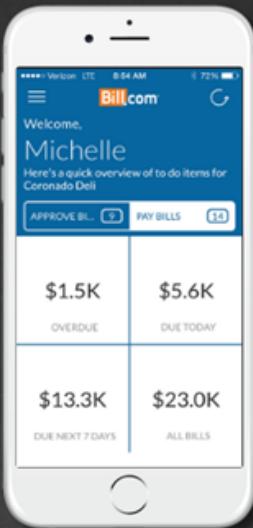
00:22  

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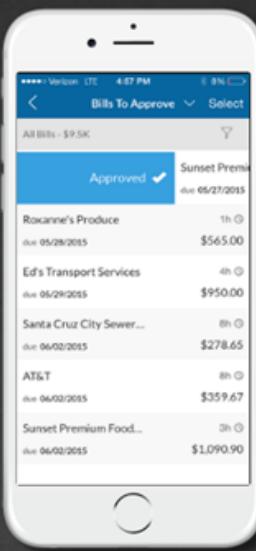


Check the original invoices.

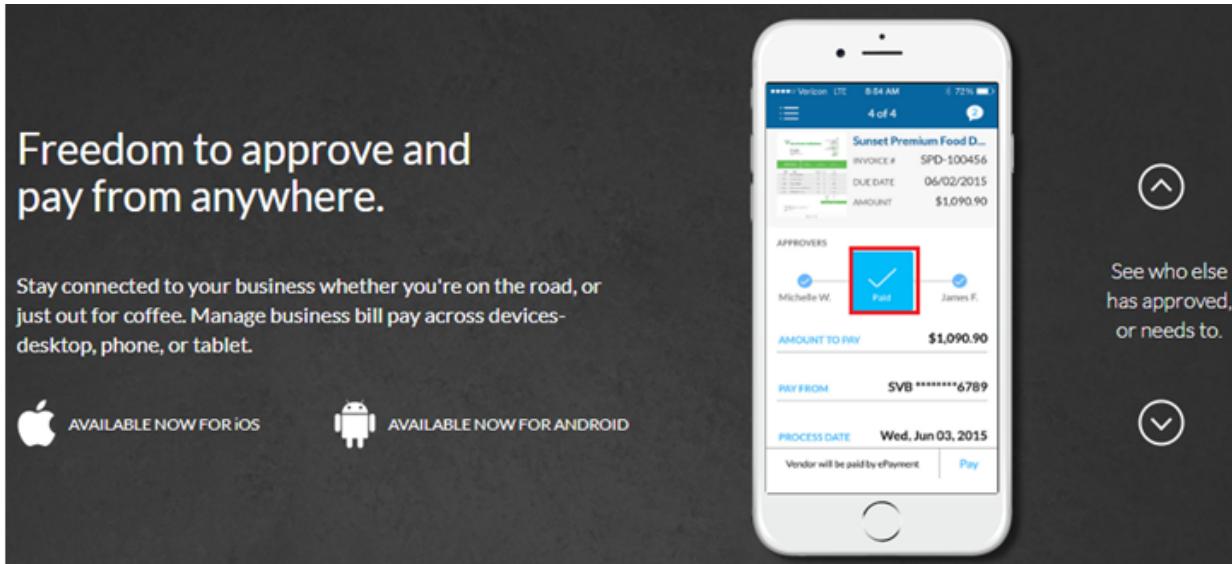
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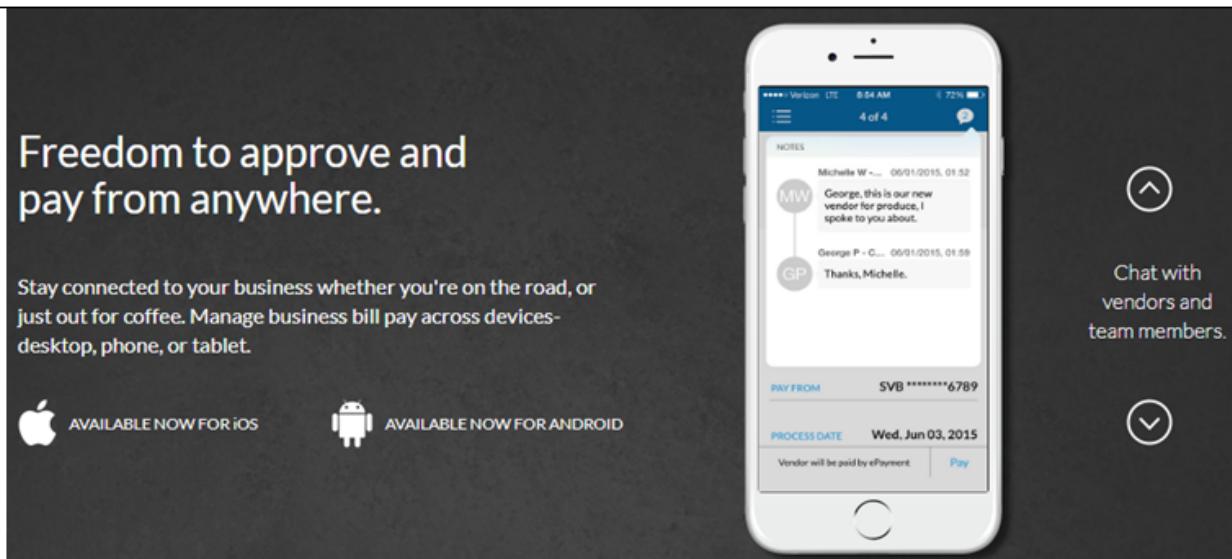
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https://www.bill.com/overview_v1/



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https://www.bill.com/overview_v1/

20. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

21. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

22. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

- (a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;
- (b) Enter an Order Enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,569,755 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);
- (c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;
- (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and
- (e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: March 22, 2018

Respectfully submitted,

/s/ Stamatiou Stamoulis

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